

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



Phone: (803) 737-0800
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DAN E ARNETT
CHIEF OF STAFF

115063

August 4, 2005

VIA HAND DELIVERY

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210

Re: Notice of Election of Piedmont Natural Gas Company, Inc. for
Application of the Natural Gas Rate Stabilization Act to Its Rates and
Charges
Docket No. 2005-125-G

Dear Mr. Terreni:

Enclosed for filing please find enclosed a copy of the Office of Regulatory Staff's Second Continuing Data Request which was served on counsel for Piedmont Natural Gas Company, Inc. Please date stamp the extra copy enclosed and return it to me via our courier.

Please let me know if you have any questions.

Sincerely,

Benjamin P. Mustian

BPM/rmg
Enclosures

cc: James H. Jeffries, IV, Esquire (w/enclosure)
Scott Elliott, Esquire (w/enclosure)
David Carpenter, Director (w/enclosure)
Tom Skains, President (w/enclosure)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-125-G

2005 JUN -5 PM 2:07
SOUTH CAROLINA
PUBLIC SERVICE COMMISSION

IN RE:)
)
Notice of Election of Piedmont Natural)
Gas Company, Inc. for Application)
Of the Natural Gas Rate Stabilization)
Act to its Rates and Charges)
_____)

CERTIFICATE OF SERVICE

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S SECOND CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below as addressed and shown below:

VIA FED EX PRIORITY OVERNIGHT


James H. Jeffries, IV
Moore & Van Allen, PLLC
100 North Tryon Street, Ste. 4700
Charlotte, NC 28202

David Carpenter, Director of Rates
Piedmont Natural Gas Company, Inc.
Post Office Box 33068
Charlotte, NC 28233

Tom Skains, President
Piedmont Natural Gas Company, Inc.
Post Office Box 33068
Charlotte, NC 28233

VIA U.S. MAIL

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205



Rena Grant

August 4, 2005
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-125-G

IN RE:

Piedmont Natural Gas Company, Inc.'s)
Election Under the South Carolina Natural)
Gas Rate Stabilization Act)
_____)

**OFFICE OF REGULATORY
STAFF'S SECOND
CONTINUING DATA REQUEST**

TO: ATTORNEYS FOR PIEDMONT NATURAL GAS COMPANY, INC.:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the Second Continuing Data Request upon Piedmont Natural Gas Company, Inc. (hereafter referred to as "Piedmont" or "the Company").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service, the same to be served upon the undersigned at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify or provide a document, "identify" and "provide" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach

to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to the Company's South Carolina Natural Gas Retail Operations for the period under review in this docket.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if the information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce the information and place it in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jay Jashinsky or John W. Flitter, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.

- IX. That the Company provide ten (10) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that the Company provide an electronic version of the responses.
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- XIV. All reconciliations and Accounting and Pro Forma adjustments shall be completed in a format which begins with Per Books amounts, shows all additions and/or subtractions being made, and ends with the As Adjusted amounts. Documentary support for each addition and/or subtraction shall accompany each such reconciliation, Accounting or Pro Forma adjustment.

REQUESTS

- 2.1 Provide, for each quarter for the past three years, the quarterly balances and embedded costs for short-term debt.
- 2.2 Identify, for each quarter for the past three years, any long-term debt that is included in short-term debt that is maturing within one (1) year.
- 2.3 Identify, for each quarter for the past three years, the amount of short-term debt used to finance gas inventory and any other specifically identifiable uses of short-term debt by amount.
- 2.4 Provide, for each quarter for the past three years, the number of shares of common stock traded.

- 2.5 Provide, for each quarter for the past three years, the principal amounts of long-term debt traded and the prices for which they were traded.



Benjamin P. Mustian, Esquire
South Carolina Office of Regulatory Staff
PO Box 11263 (29211)
1441 Main St., Ste. 300
Columbia, SC 29201
(803) 737-0800

August 4, 2005

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Post Office Box 33068
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Charlotte, NC 28233

Dear Gentlemen:

Re: Notice of Election of Piedmont Natural Gas Company, Inc. for
Application of the Natural Gas Rate Stabilization Act to Its Rates and
Charges
Docket No. 2005-125-G

Please find enclosed and served on you one (1) copy of the Office of Regulatory Staff's Second Continuing Data Request in the above-referenced matter. Pursuant to the South Carolina Public Service Commission Regulations, please provide responses to the Data Request within ten days.

Please let me know if you have any questions.

Sincerely,

Benjamin P. Mustian

BPM/rng
Enclosure
cc: Charles L.A. Terreni